REMARKS

Favorable reconsideration of this application is respectfully requested.

Claims 10-35 are pending in this application. Claims 10-22 were rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. patent 5,480,048 to <u>Kitamura et al.</u> (herein "<u>Kitamura</u>") in view of U.S. patent 5,970,319 to <u>Banks et al.</u> (herein "<u>Banks</u>"). Claims 23-35 were rejected under 35 U.S.C. § 103(a) as unpatentable over <u>Kitamura</u> in view of <u>Banks</u>.

Those rejections are traversed by the present response as discussed next.

Of currently pending claims 10-35, each of claims 10 and 23 is independent claims, and applicants respectfully submit those independent claims 10 and 23 (and thereby the claims dependent therefrom) positively recite features that clearly distinguish over <u>Kitamura</u> in view of <u>Banks</u>.

Claims 10 and 23 are directed to a device in which a conductor portion acts as a stopper in a pressing process so as to make a height of an insulating sheet equal to a height of a conductor portion.

With reference to Figures 2A-2C in the present specification as a non-limiting example, an insulating sheet 16 is pressed into a conductor portion 14 from above (see Fig. 2A). The insulating sheet 16 is pressed to a height of the conductor portion 16, and the conductor portion 14 can be used as a stopper to make the height of the insulating sheet 16 equal to the height of the conductor portion 14 (see Figs. 2B and 2C).

Applicants respectfully submit clearly the claimed features distinguish over <u>Kitamura</u> in view of Banks.

With respect to independent Claim 10, the outstanding rejection relies on <u>Kitamura</u> to disclose the claimed features therein except "pressing the insulating sheet to a height of the conductor portion using the conductor portion as a stopper to make the height of the

insulating sheet equal to the height of the conductor portion". To overcome that recognized deficiency in Kitamura the outstanding rejection cites Banks, specifically stating:

> Banks et al discloses pressing the insulating sheet to a height of the conductor portion using the conductor portion as a stopper to make the height of the insulating sheet equal to the height of the conductor portion (column 4, lines 34-46).

Applicants traverse that grounds for the rejection.

Applicants submit the disclosure in Banks does not disclose any feature even closely related to the claim features. In that respect, the cited disclosure in Banks at col. 4, lines 34-46 does not even recite a device in which conductor portions pass through insulating layers.

The cited disclosure in <u>Banks</u> at col. 4, lines 34-46 specifically states:

Dielectric layers 3 and 4 are laminated onto core layer 2 by placing the core between two sheets of dielectric material and pressing them together. When core layer 2 is made of copper, copper oxide layers 2a and 2b, commonly known as a brown, black or red oxide, are preferably provided on opposite surfaces of core layer 2 for promoting adhesion of dielectric layers 3 and 4 to core layer 2. Copper oxide layers 2a and 2b are formed on the core layer 2 by using standard surface treatment techniques, such as immersing the core layer in a brown oxide bath or a red oxide bath solution, commercially available from McGean Rohco, at a temperature of between 120° F. to 150° F. for between 30 seconds to 5 minutes.

The noted disclosure in Banks merely refers to different dielectric layers 3, 4, core layer 5, and copper oxide layers 2a, 2b. However, the core layer 2 and copper oxide layers 2a, 2b extend in parallel to the dielectric layers 3 and 4, and thus such a disclosure in Banks clearly does not apply to any device in which a height of an insulating layer is made equal to a height of a conductor portion. It is clearly the case in Banks that the height of the dielectric layers 3 and 4 is not equal to, and is completely irrelevant to, the height of any of core layer 2, or copper oxide layers 2a, 2b.

Office Action of April 9, 2007, page 2, last paragraph.

Applicants also note <u>Banks</u> is further deficient in that <u>Banks</u> does not disclose or suggest any type of pressing of an insulator sheet that would utilize a conductor portion as a stopper.

Again with reference to Figures 2A and 2B in the present specification as a non-limiting example, an insulating sheet 16 is pressed into a conductor portion 14 from above such that the conductor portion 14 is a stopper for the pressing. <u>Banks</u> clearly does not disclose or suggest any such features. In that respect applicants also note the primary reference to <u>Kitamura</u> does not disclose or suggest any such feature.

In such ways, applicants respectfully submit independent claim 10, and thereby the claims dependent therefrom, positively recites features that distinguish over the combination of teachings of Kitamura in view of Banks.

With respect to independent Claim 23, independent Claim 23 also recites "bringing an insulating sheet into contact with the conductor portion from above". Neither <u>Kitamura</u> nor <u>Banks</u> discloses or suggests such a feature, which again as noted above is shown for example in Figures 2A and 2B in the present specification.

Further, independent claim 23 also recites "pressing the insulating sheet to a height of the conductor portion using said conductor portion". Neither <u>Kitamura</u> nor <u>Banks</u> discloses or suggests such a further feature, for similar reasons as discussed above. Thereby, applicants respectfully submit that independent claim 23, and the claims dependent therefrom, also distinguish over <u>Kitamura</u> in view of <u>Banks</u>.

In view of the foregoing comments applicants respectfully submit each of currently pending claims 10-35 distinguish over the applied art.

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As no other issues are pending in this application, it is respectfully submitted that the present application is now in condition for allowance, and it is hereby respectfully requested that this case be passed to issue.

Respectfully submitted,

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